

EXHIBIT B

GARY FRANKLIN, SR.

June 16, 2021

Honorable Judge Gardephe,

My name is Gary Franklin. I am a father, a husband and, for a good part of my life, I have been a youth basketball coach. In March 2019, I went to Michael Avenatti for legal counsel. I trusted him. I had no idea that Mr. Avenatti, along with Mark Geragos, would use my story to try to line his own pockets. Mr. Avenatti really hurt me, both personally and professionally.

My world is youth basketball. I built my career in youth basketball initially with a mission to help inner city, mostly African American kids earn scholarships to college. And from the time I started in 2004, helping young basketball players was my life's work and the most important thing I could ever have imagined doing. When I founded my own basketball club with my late brother, my goal was, and has always been, to use the game of basketball to develop young men both on and off the court. I strive to be a role model and mentor to the hundreds of young men I coach. As a coach, I expect my players to maintain excellent academic standards, to volunteer in their community, and above all else, to live their lives with integrity.

I went to Mr. Avenatti seeking his counsel related to my club's Nike sponsorship. I sat down with Mr. Avenatti, and with his encouragement, entrusted him with a lot of important and confidential information. I told Mr. Avenatti I wanted him to resolve my differences with Nike, and he said he would. I didn't ask him to threaten Nike, and certainly didn't ask him to extort Nike. In fact, I did the opposite: I asked him to try open communication with a company that I had a professional relationship with. I just wanted a lawyer who could speak for me and help me understand my rights and help me set the record straight in terms of who I was and how I had run my program. I just wanted a lawyer who could convey to Nike that I was an honorable man who was just trying to keep his program.

Though I had limited experience with lawyers at this point, I trusted Mr. Avenatti to keep information I shared with him confidential and to act at all times in my interests. I placed my faith entirely in Mr. Avenatti. Mr. Avenatti quickly abused that trust when he announced on Twitter, without my knowledge and without my consent, that he would be holding a press conference to discuss a scandal at Nike that "involved some of the biggest names in college basketball." I never imagined that Mr. Avenatti would proceed to post on Twitter details of the information I had relayed to him as part of our attorney-client privileged discussions, including the names of the players I coached. I never imagined that he would go one step further and publicly post links to my confidential documents and make them available for anyone to download. And I never imagined that Mr. Avenatti would fly to New York and, along with Mr.

Geragos, use me and my information to try to extort Nike for millions of dollars. I had been betrayed by the person who was supposed to be looking out for me—my lawyer.

I read Mr. Avenatti's sentencing memorandum and understand him to be arguing that he relied on Mr. Geragos to tell him what he was doing was wrong. Mr. Geragos and Mr. Avenatti should have known that what they were doing was wrong—a lawyer shouldn't work directly against the interests of his client. What they did completely turned upside down everything I believed in what lawyers are supposed to do. I also understand Mr. Avenatti to be arguing that I didn't suffer any loss. That isn't true. Mr. Avenatti's and Mr. Geragos' actions devastated me financially, professionally, and emotionally.

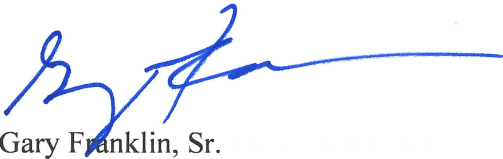
The actions of Mr. Avenatti have destroyed my reputation in my community. Enrollment in my club is at a record low. I no longer feel welcome in places I once felt comfortable. I have struggled with my mental health. My family has suffered. Because of Mr. Avenatti's actions, this "scandal" is now the first result when you Google my name. Not the hundreds of kids I've helped to coach and mentor and get into college. Not the families whose lives I've helped to change or the great relationships or the great work of our non-profit program. All of my other achievements, all of the students I have helped, are overshadowed by Mr. Avenatti's greed.

Lawyers, in my opinion, are supposed to put their clients first. One of the things that bothers me the most is that, even after he was arrested, Mr. Avenatti continued to post my private communications and my private documents on Twitter. I specifically instructed him to stop, yet he kept doing it—again, thinking only of himself.

Besides breaking my trust, and violating my confidences, Mr. Avenatti jeopardized my legal positions. I've been forced to re-pursue now, over two years later, the very issues on which I sought Mr. Avenatti's advice. All of this has contributed to my financial loss of income.

I looked to Mr. Avenatti as a trusted advisor and he put his interests over my own. He has never apologized to me for this—and to my knowledge, he has expressed no remorse for his behavior. For all of these reasons, I ask that the Court consider the impact of Mr. Avenatti's actions upon me at the time of sentencing.

Respectfully,

A handwritten signature in blue ink, appearing to read "Gary Franklin, Sr.", with a long horizontal flourish extending to the right.

Gary Franklin, Sr.